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May 23, 2024

**VIA ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 11D  
New York, New York 10007

*The application to extend  
the opening is DENIED*

*The application to extend  
the length of defendants'  
time allocation at trial  
is DENIED without  
prejudice.*

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*SO ORDERED*

*J. Williams, USDC*  
*5-31-24*

Re: Fairstein v. Netflix, Inc. et al., 20-cv-8042 (PKC)

Dear Judge Castel:

We represent Defendants in the above-captioned matter, which is scheduled for trial on June 10, 2024. We write regarding the time limits set forth in the Court's Order today (ECF No. 416), which was issued in response to a letter submitted by the Plaintiff (ECF No. 415).

We had hoped to send a joint letter to the Court with the Plaintiff in which we requested a longer period of time for opening, and in fact were about to send Plaintiff's counsel our edits to their draft letter (which they sent us on Monday) when we received their letter to the Court this morning.

In order to rebut Plaintiff's claims of falsity and actual malice, Defendants must set forth the extensive research materials and sources on which the writers relied, and show and describe them to the jury, to establish the writers' belief in the substantial truth of their portrayal. For these reasons, Defendants respectfully request an additional 5.5 hours (approximately one trial day) for our case, and 50 minutes for our opening statement. We understand that the additional time for the opening statement would be counted against our total allotted time.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Bart Williams

Bart Williams

cc: All Counsel